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August 25, 2008

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Honorable Joseph C. Spéro  
 United States District Court  
 450 Golden Gate Avenue  
 Courtroom A, 15<sup>th</sup> Floor  
 San Francisco, CA 94102

*Via Hand Delivery*

Re: 07 90552 MISC VRW (JCS)  
 Emergency Application For Travel Order For Zong Bin Li  
 Our File No. 2418-229F

Dear Judge Spéro:

At your request I am writing to set forth Fleet Management Limited's response to the above-referenced Emergency Application. Fleet sympathizes with Mr. Li for this unfortunate news and understands that his family must take priority over everything else at this time.

Fleet wishes to have either Mr. Li's deposition or live testimony at some point in the future. However, as you know for the reasons we discussed in Court, Fleet is not prepared to take Mr. Li's testimony at this time. Based upon the volumes of documents received even early this week, we are not yet in a position to advise when we can be reasonably ready to take said testimony. Fleet is also concerned that if Mr. Li is forced to remain in the United States while his family needs him, there will be a negative effect on his level of cooperation as a witness. Thus, keeping Mr. Li in the United States under these circumstances could certainly prejudice Fleet.

Mr. Li remains in the United States against his will because the government has detained him as a material witness. Assuming that the United States and the Court can formulate safeguards to ensure that Mr. Li will return to the United States or be available for deposition in Hong Kong, or some other location, in the

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future, Fleet does not object to the Court granting the Emergency Application. Presumably, the United States will cover Mr. Li's transportation costs to the People's Republic of China and back to the United States.

Very truly yours,



John Cox

JCC/kk(KYL\_SF465688)

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